

**FILED**

December 13, 2023

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: MR  
Deputy

**Case No: SA:23-CR-00637-JKP**

**UNITED STATES OF AMERICA**

**Plaintiff**

**v**

**MICHAEL CHARLES MOORE**

**Defendant**

**INDICTMENT**

**COUNT 1: 18 U.S.C. § 922(a)(6) False  
Statements Made in Connection with the  
Acquisition of Firearms**

*Notice of Government's Demand for Forfeiture*

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[18 U.S.C. §§ 922(a)(6) & 924(a)(2)]**

On or about November 30, 2023, in the Western District of Texas, Defendant,

**MICHAEL CHARLES MOORE**

in connection with the acquisition and attempted acquisition of a firearm and ammunition, to wit: a Barrett Firearms Model M82A1 rifle, bearing serial number AA016425, from Adelbridge & Co. Firearms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious oral and written statement to Adelbridge & Co. Firearms, which statement was intended and likely to deceive Adelbridge & Co. Firearms, as to a fact material to the lawfulness of such sale of the said firearm and ammunition to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of the firearm listed on an ATF Form 4473, dated November 30, 2023, when in

fact as he then knew, he was not the actual buyer of the firearm, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Firearm Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 932(b)(1) & (c)(1), 922(a)(6), 924(a)(2), subject to forfeiture pursuant to Title 18 U.S.C. §§ 934(a)(1)(b) and 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth above, the United States of America gives notice to Defendant MICHAEL CHARLES MOORE of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 934(a)(1)(A), (B) and 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 934. Forfeiture and Fines.**

**(a) Forfeiture. --**

**(1) In general.** -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (o) . . . of section 922 . . . or 933 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following property:


1. Barrett Firearms, model 82A1, .50 caliber rifle, bearing serial number AA016425; and
2. Any and all other property and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:

  
FOR CHRISTOPHER K. MANGELS  
Assistant United States Attorney